

19 MAG 11 165

ORIGINAL

Approved: 

RUSHMI BHASKARAN

Assistant United States Attorney

Before: THE HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York

- - - - - x  
UNITED STATES OF AMERICA :  
: 19 Mag.  
- v. - :  
IDRISSA DIALLO, : RULE 5(c)(3)  
: AFFIDAVIT  
Defendant. :  
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss:

GEORGE M. WHALEN, being duly sworn, deposes and says that he is a Task Force Officer with Homeland Security Investigations, Department of Homeland Security, and charges as follows:

On or about November 7, 2019, the United States District Court for the Northern District of Georgia issued a warrant for the arrest (the "Arrest Warrant") of "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling," in connection with an Indictment charging him with violations of Title 18, United States Code, Sections 1029(b)(2), 1029(a)(2) and 2, and 1028A and 2 (access device fraud, conspiracy to commit the same, and aggravated identity theft). The case number in the Northern District of Georgia is 19 Cr. 444. Copies of the Arrest Warrant and the Indictment are attached hereto as Exhibit A and incorporated by reference herein.

I believe that IDRISSA DIALLO, the defendant, who was arrested by the Westchester County Police Department in the Southern District of New York on November 25, 2019, is the same individual as the "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling" who is wanted in the Northern District of Georgia.

The bases of my knowledge and for the foregoing charge are, in part, as follows:

1. I am a Task Force Officer with Homeland Security Investigations in the Department of Homeland Security. I have been directly involved in determining whether IDRISSE DIALLO, the defendant, is the same individual as the "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling" named in the November 7, 2019, Arrest Warrant from the United States District Court for the Northern District of Georgia. Because this Affidavit is submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where I report statements made by others, those statements are described in substance and in part, unless otherwise noted.

2. Based on my involvement in this investigation, I have learned that:

a. On or about November 7, 2019, the United States District Court for the Northern District of Georgia issued a warrant for the arrest of "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling."

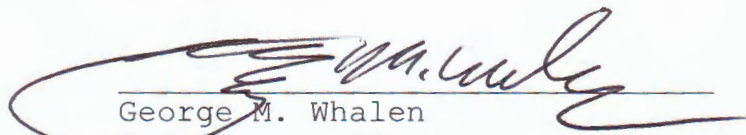
b. The warrant was issued in connection with an Indictment assigned criminal case number 19 Cr. 444. That Indictment, issued on November 6, 2019, charged "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling" with access device fraud, conspiracy to commit the same, and aggravated identity theft, in violation of Title 18, United States Code, Sections 1029(b)(2), 1029(a)(2) and 2, and 1028A and 2.

3. Based on my personal involvement in this investigation, I am aware that at approximately 2:00 p.m. on November 25, 2019, IDRISSE DIALLO, the defendant, was stopped in the Southern District of New York by a police officer ("Officer-1") of the Westchester County Police Department for committing a traffic violation. Officer-1 asked DIALLO for his driver's license, which DIALLO provided. The photograph on the license matched DIALLO's appearance. When Officer-1 checked DIALLO's license in a law enforcement database, Officer-1 learned about the Arrest Warrant from the Northern District of Georgia for "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling." In addition, DIALLO, the defendant,


stated that his name was "Idrissa Diallo." Officer-1 proceeded to arrest DIALLO on the basis of the Arrest Warrant.

4. On the evening of November 25, 2019, the Westchester Police Department transferred custody of IDRISSA DIALLO, the defendant, to me. I compared the appearance of DIALLO to photographs of the "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling" wanted by Northern District of Georgia. These photographs were provided by the investigative team responsible for bringing the prosecution against "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling." Based on my training and experience, DIALLO, the defendant, appears to be the same "Idrissa Diallo, a/k/a Jerry Chester, a/k/a Dougann Winston, a/k/a Bradley Dilling" wanted by the Northern District of Georgia.

WHEREFORE, deponent respectfully requests that IDRISSA DIALLO, the defendant, be imprisoned or bailed as the case may be.

  
George M. Whalen  
Task Force Officer  
Homeland Security Investigations,  
Department of Homeland Security

Sworn to before me this  
26th day of November, 2019.

  
THE HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York

## **EXHIBIT A**



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

UNITED STATES OF AMERICA,

WARRANT FOR ARREST

vs.

IDRISSA DIALLO a/k/a JERY CHESTER,  
a/k/a DOUGANN WINSTON, a/k/a BRADLEY DILLING  
**Agent to Arrest**CASE NO. 1:19-CR-444  
**UNDER SEAL**To: The United States Marshal  
and any Authorized United States Officer

**YOU ARE HEREBY COMMANDED** to arrest IDRISSA DIALLO a/k/a JERY CHESTER, a/k/a DOUGANN WINSTON, a/k/a BRADLEY DILLING and bring him or her forthwith to the nearest magistrate to answer a(n)

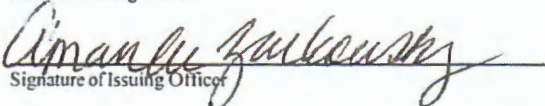
☒ Indictment    ☐ Information    ☐ Complaint    ☐ Order of Court    ☐ Violation Notice    ☐ Probation Violation Petition

Charging him or her with (brief description of offense): Conspiracy to Commit Access Device Fraud; Access Device Fraud; Aggravated Identity Theft;

in violation of Title 18, United States Code, Section(s) 1029(a) and 1029(A)(a)(1)

JAMES N. HATTEN

Name of Issuing Officer

  
Signature of Issuing OfficerClerk, U.S. District Court

Title of Issuing Officer

November 7, 2019 at Atlanta, Georgia

Date and Location

Bail Fixed at \$ \_\_\_\_\_

By: \_\_\_\_\_  
Name of Judicial Officer

---

**RETURN**

This warrant was received and executed with the arrest of the above-named defendant at:

Date Received: \_\_\_\_\_

\_\_\_\_\_  
Name and Title of Arresting Officer

Date of Arrest: \_\_\_\_\_

\_\_\_\_\_  
Signature of Arresting Officer

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN OPEN COURT  
U.S.D.C. - Atlanta  
NOV - 6 2019  
By: JAMES N. HATTEN, Clerk  
Deputy Clerk

UNITED STATES OF AMERICA

v.

IDRISSA DIALLO,  
A/K/A "JERY CHESTER,"  
"DOUGANN WINSTON," AND  
"BRADLEY DILLING"

Redacted

Criminal Indictment

No. **1:19-CR-444**

UNDER SEAL

THE GRAND JURY CHARGES THAT:

**Count One**

(Conspiracy to Commit Access Device Fraud)

1. Beginning on a date unknown, but from in or about July 2018 through at least on or about December 1, 2018, in the Northern District of Georgia, the defendants, IDRISSA DIALLO, a/k/a "Jery Chester," "Dougann Winston," and "Bradley Dilling," Redacted

did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with others known and unknown to the Grand Jury to knowingly and with intent to defraud traffic in and use unauthorized access devices during any one-year period, and by such conduct obtain things of value aggregating at least \$1,000 during that period, affecting interstate commerce thereby, in violation of Title 18, United States Code, Section 1029(a)(2).

Background

2. Sam's Club operates various retail stores and sells goods to customers.
3. Sam's Club issues memberships to individuals and companies seeking to purchase goods at its retail stores.
4. Individuals who are authorized to purchase goods from Sam's Club under a membership are issued a membership card that bears the individual's photograph.
5. The membership card must be presented in order to make a purchase of goods at Sam's Club stores.

Manner and Means

6. Defendants DIALLO Redacted , and others known and unknown to the Grand Jury, obtained Sam's Club memberships and cards in their names and aliases. In some instances, false and fraudulent tobacco licenses were provided to Sam's Club when the memberships were opened.
7. Defendants DIALLO Redacted purchased large quantities of cigarettes at Sam's Club Stores located in the Northern District of Georgia using credit cards.
8. These credit cards were issued by financial institutions, including Synchrony Financial Bank. The cards were stolen, and the purchases at Sam's Club were not authorized by the rightful account holder.
9. At times during the conspiracy, Defendants DIALLO Redacted accessed and used the same Sam's Club membership.



Overt Acts

10. From in or about July 2018, through at least on or about December 1, 2018, in furtherance of the conspiracy, and to effect the objects and purposes thereof, Defendants DIALLO <sup>Redacted</sup> , in the Northern District of Georgia, used stolen credit cards to make dozens of purchases of cigarettes from Sam's Club Stores, totaling at least \$500,000.

11. The Grand Jury incorporates by reference as overt acts the acts charged in Counts Two through Twenty-Five of this Indictment.

All in violation of Title 18, United States Code, Section 1029(b)(2).

**Counts Two through Seven**  
(Access Device Fraud)

12. From in or about July 2018, and continuing through in or about October 2018, in the Northern District of Georgia, the defendant, IDRIS DIALLO, a/k/a "Jery Chester," "Dougann Winston," and "Bradley Dilling," aided and abetted by others known and unknown to the Grand Jury, did knowingly and with intent to defraud traffic in and use an unauthorized access device, that is, the credit cards listed below, issued to the individuals listed below, and by such conduct did obtain things of value aggregating at least \$1,000 for each such card during a one-year period, affecting interstate commerce thereby:

COUNT	CREDIT CARD NUMBER	FINANCIAL INSTITUTION	INDIVIDUAL
2	XXXX XXXX XXXX 6191	Synchrony Financial Bank	N.H.
3	XXXX XXXX XXXX 0604	Synchrony Financial Bank	T.M.
4	XXXX XXXX XXXX 8014	Synchrony Financial Bank	H.L.



5	XXXX XXXX XXXX 8316	Synchrony Financial Bank	J.P.
6	XXXX XXXX XXXX 7784	Synchrony Financial Bank	R.K.
7	XXXX XXXX XXXX 5343	Synchrony Financial Bank	Z.B.

All in violation of Title 18, United States Code, Section 1029(a)(2) and Section 2.

**Counts Eight through Thirteen**  
(Aggravated Identity Theft)

13. From in or about July 2018, and continuing through in or about October 2018, in the Northern District of Georgia, the defendant, IDRISSA DIALLO, a/k/a "Jery Chester," "Dougann Winston," and "Bradley Dilling," aided and abetted by others known and unknown to the Grand Jury, did knowingly possess and use, without lawful authority, a means of identification of another person, that person being identified below, during and in relation to committing the felony violation identified below:

COUNT	PERSON	FELONY VIOLATION
8	N.H.	Access Device Fraud as alleged in Count 2 of this Indictment
9	T.M.	Access Device Fraud as alleged in Count 3 of this Indictment
10	H.L.	Access Device Fraud as alleged in Count 4 of this Indictment
11	J.P.	Access Device Fraud as alleged in Count 5 of this Indictment
12	R.K.	Access Device Fraud as alleged in Count 6 of this Indictment
13	Z.B.	Access Device Fraud as alleged in Count 7 of this Indictment

All in violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

### Counts Fourteen through Nineteen (Access Device Fraud)

Redacted

[illegible]

### Counts Twenty through Twenty-Five (Aggravated Identity Theft)

Redacted

Redacted


#### Forfeiture

16. Upon conviction of one or more of the offenses alleged in Counts One through Seven and Fourteen through Nineteen of this Indictment, the defendants, IDRISSA DIALLO, a/k/a "Jery Chester," "Dougann Winston," and "Bradley Dilling," Redacted

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting or derived from proceeds obtained directly or indirectly as a result of said violations and pursuant to Title 18, United States Code, Section 1029(c), any personal property used or intended to be used to commit said violations.



17. If any of the above-described forfeitable property, as a result of any act or omission of a defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficult;

the United States intends to seek forfeiture of any other property of said defendants up to the value of the forfeitable property, pursuant to Title 21, United States Code, Section 853(p); as incorporated by Title 18, United States Code, Section 1029(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

Leticia Benjamin  
FOREPERSON

BYUNG J. PAK

*United States Attorney*



KELLY K. CONNORS

*Assistant United States Attorney*

Georgia Bar No. 504787

600 U.S. Courthouse

75 Ted Turner Drive SW Atlanta, GA 30303

404-581-6000; Fax: 404-581-6181